

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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January 4, 2021

BY ECF & EMAIL

Honorable Judge Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

**Re: United States v. Antonio Zambrano
20 Cr. 621 (LTS)**

Dear Judge Swain:

I write on behalf of my client, Antonio Zambrano, to respectfully seek a modification to Mr. Zambrano's bail conditions so that he can travel from New Braunfels, Texas, where he resides and is supervised, to Midlothian, Texas for a work-related trip starting on January 5, 2020 and lasting approximately three weeks. The government and Pretrial Services in New York do not object to this request. Mr. Zambrano's supervising pretrial officer in Texas defers to the position of Pretrial Services in New York.

On October 28, 2020, Magistrate Judge Ona T. Wang imposed the following bail conditions, *inter alia*: a \$75,000 personal recognizance bond co-signed by two financially responsible persons and one moral suasion co-signer; travel limited to SDNY/EDNY and the Western District of Texas; surrender of all travel documents and no new applications; home detention with electronic monitoring; and defendant to continue or seek employment.

Mr. Zambrano is a welder by trade, and he has secured an opportunity to work as an independent contractor for three weeks at a cement plant in Midlothian, TX, which is located in the Northern District of Texas. If permitted to travel, Mr. Zambrano will provide a detailed itinerary, including contact information, to his supervising pretrial officer before leaving. He would stay at a hotel in Alvarado, TX, a seventeen-minute drive away from the cement plant. The government and Pretrial Services-New York do not object to this request.

We recognize the time-sensitive nature of this request, and we appreciate the Court's consideration of this matter.

The request is granted, subject to compliance with the foregoing notification and location conditions. DE# 17 resolved.

SO ORDERED.

1/4/2021

/s/ Laura Taylor Swain, USDJ

Respectfully submitted,

/s/ Mark B. Gombiner

Mark B. Gombiner, Esq.

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cc: AUSA Jacob Gutwillig (by ECF)
NY-PSO Jonathan Lettieri (by E-mail)